

# EXHIBIT A –

Notice of Taking Plaintiff's Videotaped Deposition

CITY ATTORNEY'S OFFICE  
CITY OF HENDERSON  
240 S. WATER STREET MSC 144  
HENDERSON, NV 89015



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Attorneys for Defendants

City of Henderson, Officer C. Watts,

Officer B. Shaffer, Sgt. K. Abernathy

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MARK CLIFFORD SYKES,

Plaintiff,

v.

CITY OF HENDERSON (A.K.A.)  
HENDERSON POLICE DEPARTMENT of  
CLARK COUNTY NEVADA, OFFICER C.  
WATTS P#2171, OFFICER B. SHAFFER  
P#2237, SERGEANT K. ABERNATHY  
P#1207 in their individual capacity, et.al.,

Defendants.

CASE NO.: 2:22-cv-00956-JAD-EJY

**NOTICE OF TAKING PLAINTIFF'S  
VIDEOTAPED DEPOSITION**

TO: Mark Clifford Sykes, Plaintiff

PLEASE TAKE NOTICE THAT Defendants will take the videotaped deposition of Plaintiff, Mark Clifford Sykes on **March 5, 2025, at 1:30 p.m.**, upon oral examination pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, before a Notary Public, or before some other officer authorized by law to administer oaths. The deposition will take place at the Henderson City Attorney's Office, 240 Water Street, 4<sup>th</sup> Floor of City Hall, Henderson, Nevada 89015.

1 PLEASE TAKE FURTHER NOTICE that should the deponent require the assistance of an  
2 interpreter at the time of the deposition, deposing counsel should be notified at least seven (7)  
3 business days prior to the deposition, identifying the language and dialect, if any. If the deposition  
4 is suspended due to the need for an interpreter, the deponent shall bear the costs of such failed  
5 deposition.  
6

7 You are invited to attend and cross-examine.

8 DATED this 6<sup>th</sup> day of February 2025.

9 CITY OF HENDERSON

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12 NANCY D. SAVAGE  
13 Assistant City Attorney  
14 Nevada Bar No. 392  
15 240 Water Street, MSC 144  
16 Henderson, Nevada 89015  
17 Attorneys for Defendants  
18 City of Henderson, Officer C. Watts,  
19 Officer B. Shaffer, Sgt. K. Abernathy

20 **CERTIFICATE OF SERVICE**

21 Pursuant to FRCP 5(b), I hereby certify that I am an employee of the CITY OF  
22 HENDERSON, and that on the 6th day of March 2025, I served by depositing the same in the United  
23 States Mail, postage fully prepaid thereon, a true and correct copy of the foregoing **NOTICE OF**  
24 **TAKING PLAINTIFF'S VIDEOTAPED DEPOSITION**, addressed as follows:

25 MARK CLIFFORD SYKES  
26 P.O. Box 674  
27 Russellville, Arkansas 72811

28   
Employee of the Henderson City Attorney's Office

CITY ATTORNEY'S OFFICE  
CITY OF HENDERSON  
240 S. WATER STREET MSC 144  
HENDERSON, NV 89015